

Allegheny County Health Department

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BUREAU OF ENVIRONMENTAL QUALITY
Division of Air Quality
Engineering Section
301 Thirty-ninth Street
Pittsburgh, Pennsylvania 15201

July 28, 1993

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Ms. C. A. Corbin, Attorney
Law Department
U. S. Steel Corporation
600 Grant Street
Pittsburgh, PA 15219-2749

RE: NOX CONTINUOUS EMISSIONS MONITORING (CEM)

Dear Ms. Corbin:

Thank you for your letter of June 29 regarding U.S. Steel's position that NOx-CEM is not required on Clairton's "B" Battery.

Please refer to attached letter dated December 17, 1992 from the PaDER to Bethlehem Steel in which coke ovens are ruled to be subject to requirements for CEM. Our legal staff has reviewed this situation; this Bureau will follow the lead of the DER and has therefore determined that Battery "B" is subject to NOx-CEM requirements.

If there are any questions, please contact John Serpa, Assistant County Solicitor, at 578-8108.

Thank you for your cooperation in this matter.

Very truly yours,

A handwritten signature in cursive script, reading "A. H. Fieser".

A. H. Fieser, Ph.D., P.E.
Chief - Engineering Section

AHF:jad

Attachments

cc: J.R. Serpa (w/attch.)

E.J. Taylor "

W.U. Clark "



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bethlehem District Office
4530 Bath Pike
Bethlehem, PA 18017
215-861-2070

December 17, 1992

Bethlehem Steel Corporation
501 East Third Street
Bethlehem, PA 18016

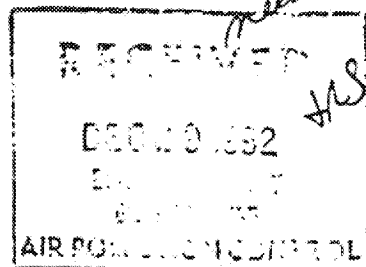
Attention: Mr. T.E. Kreichelt
Supt., Environment, Safety & Health

Gentlemen:

The Department is in receipt of your letter of December 11, 1992, which was received in the Bethlehem Office on December 16, 1992. In your letter, you request concurrence that Bethlehem Steel will not be required to install a continuous nitrogen oxides monitoring system on Coke Battery "A".

The Department cannot concur for the following reasons:

1. We have determined that since the coke ovens burners are designed to produce heat by indirect heat transfer, the coke oven battery constitutes a combustion unit as defined in 25 PA Code 123.1. A combustion unit is defined as "a stationary unit used to burn fuel primarily for the purpose of producing power or heat by indirect heat transfer."
2. In addition, you stated that if the term "combustion unit" applies it would apply only to each oven or pair of ovens served by common flue. A coke oven battery is defined in 25 PA Code 123.1 as "a jointly operated group of slot-type coke ovens the operation of which results in the destructive distillation of coal by the indirect application of heat". A coke oven battery is a single source for the purpose of this article and shall include, but not be limited to the following, when present, the ovens . . . By this definition, the entire Battery is considered to be a combustion unit.



John
PHI - determine
in Beth that combustion
need not con
Joe Papp

12/1
cc: RJC
CJG
RCW
HLP
AHF
GTZ

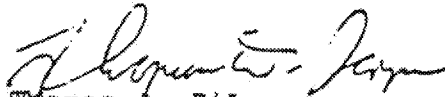


December 17, 1992

Since coke Battery "A" is a combustion unit, the Department cannot exempt Bethlehem Steel from the requirements of 25 PA Code 123.51. Therefore, the Department expects that a continuous nitrogen oxides monitoring system will be installed on Battery "A" on or before October 20, 1993 as required by the regulation.

If you have any questions, please contact me at this office.

Very truly yours,



Thomas A. DiLazaro
Acting Air Quality
Program Manager

TAD/bas

CC: ✓ Joe Pezze *PITTSBURGH*
Bob Kulp